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VII.B.1.b

Bryan W. Shaw, Ph.D., *Chairman*  
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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 20, 2011

Mr. Stephen Halaz  
TRC Environmental Corporation  
505 East Huntland Drive, Ste. 250  
Austin, Texas 78752

Re: Comments to the Proposed Texas Land Application Permit, dated July 2011  
Falcon Refinery  
1472 FM 2725, San Patricio County, Ingleside, Tx. 78362  
SUP111

Dear Mr. Halaz:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the proposed Texas Land Application Permit and has the following comments/questions.

It is noted that the permit application includes several Attachments, with no labeling on the tabs separating the different Attachments. Please label the tabs for reference purposes.

Section 1.2 Facility/Site Information: Paragraph b provides a brief description of the wastewater generating process which generally indicates that the tanks stored petroleum hydrocarbon products. However, this paragraph does not include the fact that some of the tanks on-site also stored hazardous wastes. Please explain why this information was not included.

Section 2.0 Treatment System: This section refers to the Chemicals of Concern (COCs) that the wastewater will be tested for, after treatment through the Granular Activation Carbon (GAC) system. However, no list of the proposed specific COCs was provided. Note that Work Sheet 3.0 of the Attachments, Land Disposal of Effluent, is not considered a list of the COCs that need to be sampled. Please provide a list of the COCs intended to be sampled from the GAC system prior to discharge.

In addition to these comments, please see the attached TCEQ Interoffice Memorandum containing the results of the Wastewater Section's comments to the proposed permit application.

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Please respond to these comments and submit your response within 30 days from the date of this letter.

If you have any questions, or wish to discuss any of these matters please call me at (512)239-1054, or email me at [Phillip.Winsor@tceq.texas.gov](mailto:Phillip.Winsor@tceq.texas.gov).

Sincerely,

A handwritten signature in cursive script that reads "Phillip Winsor".

Phillip Winsor, P.E.  
Superfund Section  
Remediation Division  
Texas Commission on Environmental Quality

PW/sr

cc: Rafael Casanova, RPM, U.S. Environmental Protection Agency, Superfund  
Division (6SF-RA), 1445 Ross Avenue, Suite 1200, Dallas, TX 75202-2733

Attachment

## **TCEQ Interoffice Memorandum**

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**To:** Satya Dwivedula, Permit Writer, Industrial Permits Team

**From:** April Hoh, P.G., Geologist, Water Quality Assessment Team *al 9/8/11*  
Amanda Pirani, P.G., Agronomist, Water Quality Assessment Team *ap 9/8/11*

**Date:** September 8, 2011

**Subject: Groundwater Review of Texas Land Application Permit (TLAP)  
for Falcon Refinery Superfund Site, San Patricio County**

On August 23, 2011, the Water Quality Assessment (WQA) Team was asked to review the Texas Land Application Permit (TLAP) for Falcon Refinery Superfund Site for potential impacts to groundwater quality. The staff geologist and agronomist reviewed the permit application as well as published information on groundwater, geology, and soils at the proposed site and provide the following conclusions.

According to the Natural Resources Conservation Service (NRCS) published information on soils, the proposed irrigation area has the potential for a shallow water table with an upper limit between 0.0 to 0.5 feet below the soil surface from January to December. The Falcon Refinery TLAP proposal does not provide sufficient justification or site specific information to ensure that the proposed irrigation activities will not discharge to this shallow groundwater.